

# **EXHIBIT 97**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-  
GUERRA, MICHAEL MAERLENDER, BRANDON  
PIYEVSKY, BENJAMIN SHUMATE, BRITTANY  
TATIANA WEAVER, and CAMERON WILLIAMS,  
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE  
OF TECHNOLOGY, UNIVERSITY OF CHICAGO,  
THE TRUSTEES OF COLUMBIA UNIVERSITY IN  
THE CITY OF NEW YORK, CORNELL  
UNIVERSITY, TRUSTEES OF DARTMOUTH  
COLLEGE, DUKE UNIVERSITY, EMORY  
UNIVERSITY, GEORGETOWN UNIVERSITY, THE  
JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS  
INSTITUTE OF TECHNOLOGY, NORTHWESTERN  
UNIVERSITY, UNIVERSITY OF NOTRE DAME DU  
LAC, THE TRUSTEES OF THE UNIVERSITY OF  
PENNSYLVANIA, WILLIAM MARSH RICE  
UNIVERSITY, VANDERBILT UNIVERSITY, and  
YALE UNIVERSITY,



Defendants.

Case No.: 1:22-cv-00125

Hon. Matthew F. Kennelly

**STIPULATION BETWEEN PLAINTIFFS AND DEFENDANT VANDERBILT  
UNIVERSITY**

With respect to the above-captioned matter (the “Litigation”), Plaintiffs and Defendant Vanderbilt University (“Vanderbilt”) hereby enter into the following stipulation and agreement (“Stipulation”), and agree as follows:

1. Vanderbilt stipulates that from January 1, 2003 through April 8, 2020, Vanderbilt in some instances made admissions decisions regarding undergraduate students based on factors that included the “financial circumstances” of such students and their families, as that term has been defined by Judge Kennelly in his (i) Motion to Dismiss Opinion (Dkt. No. 185) and (ii) the Court’s other decisions and rulings to date in the Litigation.
2. Vanderbilt hereby waives and will not for any purpose or in any way invoke or claim immunity under the Section 568 Exemption (15 U.S.C. § 1, note) during this Litigation.
3. 
4. 
5. Notwithstanding anything set for the herein, Plaintiffs are entitled to use any Vanderbilt’s anonymized structured data (*i.e.*, data which uses unique identifiers (“UIDs”) not natural names), in the preparation of expert reports or testimony, or for any other legitimate purpose, on any issue in this Litigation, subject to the Confidentiality Order in this case (Dkt. No. 254).

Dated: November 3, 2023

By: /s/ Robert D. Gilbert

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